

# **EXHIBIT G**

## **(Redacted)**

Hon. Jed S. Rakoff  
Avenue,  
Daniel Patrick Moynihan United States Courthouse  
500 Pearl Street New York  
NY 10007-1312

[REDACTED]  
[REDACTED]  
England

**Email:**

4<sup>th</sup> June 2023

Dear Judge, Rakoff,

My name is Molly McGuinness, I am a single without children, aged 27 (04.05.1996).

I am employed by The Very Group, as a Speech Analytics Programmer. I have worked for The Very Group since September 2012, whilst completing my A-Levels and studying at university for my Psychology degree. I was employed originally on a part-time basis in another role for the duration of my time in higher education, and after achieving my degree I obtained full time employment and have gone on to be promoted into the role I currently hold.

I am the cousin of Joseph O'Connor, and my sister Niamh and I are extremely close with his mother Sandra to the extent that we always sent her Mother's Day cards and gifts throughout our life.

Joseph went with Sandra to live in Spain at an early age, I was too young at the time to understand why they emigrated but prior to this we had met with them every weekend at my maternal grandmothers.

Whilst Sandra and Joseph were living in Spain my grandmother would take myself and sister and Joseph older brother Jake to stay with them throughout the summer.

My grandmother would look after us whilst Sandra worked, usually in the morning and then we would spend the rest of the days as a family by the pool playing and enjoying the summer holiday. We would also meet with the same friends who also went to the complex each year, and this continued until Sandra and Joseph returned to England when he was about 11 or 12.

Joseph during our holidays could be described as what I believed at the time as unempathetic towards people's feelings, as though he could not compute how certain actions or words may upset someone.

[REDACTED]

An example is appearances, I would as a young teenager spend hours curling my hair, experimenting with makeup, changing outfits numerous times, involving hours of time to achieve a certain look. Joseph would be annoyed I was wasting time on "nonsense "as he

called it. When I was ready we would only sit on the benches in the complex with the other holiday makers, play music and chat, so he was at a loss to understand why my sister and I took so long to get ready. Once when I was ready he saw me and started laughing, I thought I looked nice, but he said I looked like a Clown. I was obviously at a sensitive time and this upset me, but I now know he was not being mean, it was just his nature, he did not understand social norms in this regard. Sandra was always telling him if he was not giving compliments, to stay silent but he could not help it, when he was reprimanded he would always say sorry but qualify it that it slipped out and he forgot he wasn't to say such things even if it was the truth.

When I got older, I realised there is not a mean bone in his body, in fact the opposite, he is the most caring kind and gentle person. My dad has a similar nature and Joseph has always shared a good relationship with him. They are both quiet and we laugh as they sit together sometimes not speaking for hours but are comfortable together, I think their similar natures permits this and that's why Joseph always at social gatherings sits by my dad Brian.

From a child, Joseph had always showed an interest in gaming, I remember fondly one Summer he had recently been gifted a new game for his birthday. Usually, Joseph preferred to spend time alone whilst playing on his games, however, we bonded over my knowledge over a topic, involving training animals in the game. Joseph is such a lover of animals, that I believe he prefers them to people. We would spend time playing the game together, the game was in English and Joseph could only read and write Spanish at this point, although he spoke English fluently.

I remember this being one of the first occasions as only a young teenager myself seeing how caring Joseph's nature is. He has always held an extremely close bond with Sandra, so his loving and devoted nature towards her has always been apparent. But I remember during this Summer that I was able to forge my own bond with Joseph, one where we both began to understand each other a bit more.

Once Joseph returned to England with Sandra, we began to have less interactions with him, it was apparent that Joseph was extremely introverted and would prefer his own company over the company of others. It tended to be that my interactions with Joseph were only during family occasions, and even during them Joseph would be extremely quiet and would not engage in conversations. He would tend to try and find a place that was quiet, and almost calming for him, I had noticed he would spend time with my father (Brian) during these family occasions. He enjoyed that my father would take interest in things that Joseph liked, I have a particular memory of a Christmas that Joseph who has always been obsessed with chess, spent the entire day with my father playing.

Although, we did not have as much interaction with each-other due to my close relationship with Sandra, I know that she would update him on anything Niamh and I were doing, and he would take interest in this. Joseph has always had a very clear vision when it comes to the fairness and treatment that others receive, however this can sometimes come across as naïve, where his actions although he believes are good can lead to poor consequences.

I remember once he had a friend Solomon was being bullied by a large group at school as he was the only Asian boy and suffered extreme racial abuse that Joseph could not understand at all.

Joseph would intervene at school and did not care of the consequences, which were many, due to Joseph's way of thinking only in a black and white manner of what is right and wrong when treating a person, he attempted to stand up for his friend.

Solomon, lived by our grandmothers' home and Joseph would invite him for dinner and even took to inviting his sisters also but neglecting to ask permission first, so our grandmother had to prepare a vegetarian meal without notice.

Once Joseph had moved back to Spain as a young adult, our contact became less frequent, especially during COVID. He would keep himself to himself, and this is something that I had become accustomed to.

However, when it was safe to travel again myself and my ex-partner decided to visit Sandra and Joseph in Spain. Joseph tended to stay in his room during our first couple of days, his routine was almost backwards to the ourselves and we were sleeping and awake during different times of the day. But, to my surprise he eventually decided to out to dinner with us. He almost insisted we go to a particular restaurant as he had a somewhat obsession with trying a particular food that he had been told about. I remember him asking Sandra to ensure the restaurant had this food, this wasn't in a demanding way either it was very much excitement.

We then went for a few more breakfast and dinners together, once again Joseph would be seemingly quiet unless he could relate to the conversation, and of course we didn't mind doing this because we both enjoyed having his company and wanted to make him feel as comfortable as possible.

One evening we had gone for dinner, and Joseph had witnessed another customer order a bottle of champagne. He was then almost insistent that we had to get one ourselves, I was in disbelief at the time because Joseph does not drink alcohol, and partner and I were not drinking this evening either. When I asked why he was so insistent that we get a bottle, he said that he didn't care to drink the champagne but just wanted the bottle as it had built in lights, and he thought it was cool so wanted to buy one to bring home.

Sandra had not been able to make the dinner that evening but had provided her bank card for us to pay for the dinner. And, although I tried to convince Joseph that buying an expensive bottle of champagne simply for the lights was ludicrous and repeatedly telling him he was not thinking clearly about this, he proceeded to do so.

Upon our arrival home, Sandra was furious this had occurred, she tried telling Joseph that it was insane behaviour to buy a bottle of champagne (especially considering he doesn't drink) simply for a light. However, Joseph still could not understand the rationale behind Sandra's anger.

Joseph is not demonstrative with his emotions at all, whether sad or happy, he comes across difficult to read but once you know him, you will see he is kind, considerate, loyal and gentle but a defender of anyone in need.

Joseph after this terrible episode in his life can now begin afresh.

Out of this ordeal he has broken away from that reclusive lifestyle and speaks optimistically about his future.

He regrets his decision to take a year out and delay University, which led to another year and then he did not go at all but fell into this reclusiveness lifestyle which became his downfall, but which now can lead to him leading a more positive life

He wants to now work, and study and I think almost try and regain the lost time wasted on gaming and living this online life which was not reality but harmful and very detrimental to someone like Joseph, who is too trusting and taken advantage of easily if he believes they are his friends

He misses his dogs and is looking forward to walking them again. He at the stage when he stayed at home, would only walk them in the early hours so he did not have to encounter other people.

Joseph did not suffer in lockdown, it made zero difference to his life.

When Spain was subjected to strict Covid measures and residents were only allowed to leave their homes an hour per day, or to visit nearest supermarket, they were stopped by the army who would check their compliance.

Joseph was unaware of the army tankers around his area as he never left his home at all, his life was already being lived this way.

This shows a severe problem that would have been impossible for him to have had the capacity to think long term as he lives in the moment only.

His arrest as far as it has been terrible for him, may be the best intervention in living his life more productively in the future. He now knows as an adult he can do things and interact and what he endured at school and problems with peers is no longer a problem.

Joseph's current situation in custody is so distressing to hear about. That he is the victim of bullying and worse, is fearful daily and in a state of anxiety is beyond sad.

I would urge you to show compassion and leniency and see that what has occurred by his imprisonment in the past two years has been far harder for him, [REDACTED]  
[REDACTED] and that he is a good, kind and thoughtful person whose punishment to date especially in the current prison is beyond harsh and acceptable.

Thank you for taking the time to consider this letter.

Yours Faithfully

Molly McGuinness